

Lee M. Herman, Esquire
Attorney I.D. No: 27570
280 N. Providence Road Suite 4
Media, PA 19063
(610) 891-6500
Attorney for Debtor

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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In re:	:	
	:	CHAPTER 11
HOLDEN ROBERT ASSOCIATES LLC	:	
	:	Case No. 22-13395-mdc
Debtor.	:	
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**DEBTOR’S APPLICATION TO EMPLOY LEE M. HERMAN, ESQUIRE
AS COUNSEL TO THE DEBTOR *NUNC PRO TUNC* TO THE PETITION DATE**

1. On December 21, 2022, Holden Robert Associates LLC, (“Debtor” or “Applicant”) filed a Voluntary Petition for Relief under Chapter 11 of Title 11 of the United States Code.

2. The Debtor is not sufficiently familiar with the rights and duties of the Debtor-in-Possession as to be able to plan and conduct proceedings without the aid of competent counsel.

3. The Debtor has made careful and diligent inquiry into the qualifications and competence of the law firm of Lee M. Herman, Esquire, and is advised that Lee M. Herman, Esquire, by reason of ability, integrity and professional experience, is capable of providing proper legal counsel to the Applicant.

4. Applicant has engaged the services of Lee M. Herman, Esquire, as attorneys for the Debtor, subject to the approval of the court.

5. Lee M. Herman, Esquire is to render the following professional services:
 - a. to give the Debtor legal advice with respect to its powers and duties as Debtor-in-Possession;
 - b. to prepare on behalf of your Applicant as Debtor necessary applications, answers, orders, reports and other legal papers; and
 - c. to perform all other legal services for the Debtor as Debtor which may be necessary herein.

6. The professionals at Lee M. Herman, Esquire who are most likely to work on this bankruptcy are:

- a. Lee M. Herman, Esquire \$400.00 per hour
- b. Pamela J Starr, Paralegal \$136.00 per hour

WHEREFORE, your Applicant prays for the appointment of Lee M. Herman, Esquire, as counsel for the Debtor, at such compensation as the Court allows.

Respectfully submitted this 30th day of January 2023.

Holden Robert Associates LLC

s/ Christopher Linton
By: _____
Christopher Linton
Sole Member and Director

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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**NOTICE OF DEBTOR'S APPLICATION
TO EMPLOY LEE M. HERMAN, ESQUIRE AS COUNSEL TO THE DEBTOR
NUNC PRO TUNC TO THE PETITION DATE**

TO: Office of the U.S. Trustee, Rule 2002 Parties, All Creditors and Parties-in-Interest:

NOTICE IS HEREBY GIVEN THAT:

1. On December 21, 2022, Holden Robert Associates LLC ("Debtor") filed a Voluntary Petition for relief under Chapter 11 of Title 11 of the United States Code.
2. An Application of Debtor to Employ Lee M. Herman, Esquire as Counsel to the Debtor ("Application") has been filed with the United States Bankruptcy Court for the Eastern District of Pennsylvania, Robert N.C. Nix, Sr. Federal Courthouse, 900 Market Street, Suite 400, Philadelphia PA 19107, where it is available for inspection during normal business hours.
3. The Debtor has determined that it requires the services of bankruptcy counsel.
4. The fees and services to be provided to the Debtor by Lee M. Herman, Esquire are fully outlined in the Declaration of Lee M. Herman, Esquire, which is attached to the Application, and are incorporated herein by reference.

5. Any creditor or party-in-interest, or the United States Trustee, may file an answer, objection or other responsive pleading to the Application with the Office of the United States Bankruptcy Court for the Eastern District of Pennsylvania, Robert N.C. Nix, Sr. Federal Courthouse, 900 Market Street, Suite 400, Philadelphia PA 19107, and serve a copy upon counsel for the Debtor whose name and address appear below within eight (8) calendar days of the date of this Notice. Any creditor, party-in-interest, or the United States Trustee may request a hearing in writing stating the reason why a hearing is necessary.

6. In the absence of any answers, objections, responsive pleadings, or requests for a hearing, the Court may enter an Order approving the Application to Employ Lee M. Herman, Esquire, as Counsel to the Debtor.

Respectfully submitted this 30th day of January 2023.

LEE M. HERMAN, ESQUIRE

/s/ Lee M. Herman

Lee M. Herman, Esquire
Attorney I.D. No: 27570
280 N. Providence Road Suite 4
Media, PA 19063
(610) 891-6500
lmh@lmhlaw.com

Attorney for Debtor

**UNITED STATES BANKRUPTCY COURT
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**VERIFIED STATEMENT IN SUPPORT OF APPLICATION TO EMPLOY
LEE M. HERMAN, ESQUIRE AS COUNSEL TO THE DEBTOR
NUNC PRO TUNC TO THE PETITION DATE**

In accordance with Bankruptcy Rule 2014, I, Lee M. Herman, Esquire, hereby states as follows:

1. I am an attorney and counselor at law, duly admitted to practice in the Commonwealth of Pennsylvania and in this Court.
2. I am with the law firm of Lee M. Herman, Esquire, 280 N. Providence Road Suite 4, Media PA 19063.
3. Lee M. Herman, Esquire, has extensive experience in bankruptcy, insolvency, corporate reorganization. and debtor/creditor law. The firm is well qualified to represent the Debtor, generally, herein and is willing to accept employment on the basis set forth in the annexed Application.
4. To the best of my knowledge, information and belief, neither I nor any member of my firm has any connection with the Debtor, creditors or any other party in interest or accountants, except as set forth herein.
5. Additionally, to the best of my knowledge, information and belief, neither I nor any member of my firm, holds any interest adverse to the above-entitled Estate, which

would disqualify it from representing the Debtor, and said law firm is a disinterested person as that term is defined in 11 U.S.C. § 101(1).

6. As of the petition date, the following payments were made by the Debtor for professional services to be rendered:

Date Received	Amount Received	Amount Applied to Services Rendered Before Receipt	Amount Applied to Services Rendered After Receipt	Amount Remaining on Petition Date
12/21/2022	\$7,000.00	\$0.00	\$1,738.00*	\$5,262.00

** Filing fee*

Prior to the filing, I was retained to represent the Debtor in a state court collection case and defense of a counterclaim on a 40% contingency of any recovery. No fee is due, as the case never settled.

I declare under penalty of perjury that the foregoing statements are true and correct to the best of my knowledge, information and belief.

Respectfully submitted this 30th day of January 2023.

LEE M. HERMAN, ESQUIRE

/s/ Lee M. Herman

By: _____
Lee M. Herman, Esquire

Lee M. Herman, Esquire
Attorney I.D. No: 27570
280 N. Providence Road Suite 4
Media, PA 19063
(610) 891-6500
Attorney for Debtor

**UNITED STATES BANKRUPTCY COURT
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CERTIFICATE OF SERVICE

I, Lee M. Herman, hereby certify that a copy of the within Application to Employ Lee M. Herman, Esquire, was served by U.S. States mail, postage prepaid upon the parties listed on the attached list.

Respectfully submitted this 30th day of January 2023.

LEE M. HERMAN, ESQUIRE

s/ Lee M. Herman
By: _____
Lee M. Herman, Esquire

VIA ECF

United States Trustee
833 Chestnut Street
Suite 500
Philadelphia, PA 19107

Pamela Elchert Thurmond
City of Philadelphia
1401 JFK Blvd, 5th Floor
Philadelphia, PA 19102-1595

**UNITED STATES BANKRUPTCY COURT
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ORDER

AND NOW, this _____ day of _____, 2023, upon consideration of the Application of the Debtor to Employ Lee M. Herman, Esquire as Counsel, and any response thereto, it is **ORDERED** and **DECREED** that Debtor's Application to Employ Lee M. Herman, Esquire as Counsel is hereby **APPROVED**; and it is further,

ORDERED and **DECREED** that the Debtor may employ Lee M. Herman, Esquire, as its counsel in these proceedings to advise it upon all matters which may arise or which may be incident to these proceedings, said firm to be paid at such compensation as the Court shall allow, pursuant to a proper Application in accordance with In re Busy Beaver Building Center, Inc., 19 F. 3d 33 (3rd Cir. 1994).

BY THE COURT:

U.S. BANKRUPTCY JUDGE